

[NL020680]

RECEIVED
CENTRAL FAX CENTER

FEB 07 2007

REMARKS**I. INTRODUCTION**

Claims 1-3 have been amended and claims 10-16 have added. No new matter has been added. Thus, claims 1-16 are now pending in this application. It is respectfully submitted that based on the above amendments and the following remarks all of the presently pending claims are in condition for allowance.

II. THE 35 U.S.C. § 102(e) REJECTIONS SHOULD BE WITHDRAWN

The Examiner has rejected claims 1-3, 5 and 7-9 under 35 U.S.C. § 102(a) and (e) as unpatentable over U.S. Pat. No. 7,006,129 (McClure). (See 11/7/06 Office Action, p. 2, ¶ 2).

McClure describes a rear-view display system comprising a single camera mounted near the rear of a vehicle and a display located near the top center portion of a windshield. (See McClure, abstract). A servo system controls the camera using two motors which respectively control horizontal and vertical movement. A sensor coupled to the display controls the movement based on adjustments to the position of the display, in a manner similar to a rear-view mirror. (Id. at col. 2, ll. 45-55).

Claim 1 recites "the imaging system comprising a plurality of cameras, each of the cameras providing a different view" and "orientation adjusting means arranged to adjust the viewing orientation of the imaging system" and "sensor means for detecting adjustments in the orientation of the display means, the sensor means being connected to the orientation adjustment means" and "the orientation adjusting means being arranged to adjust the viewing orientation of the imaging system based on signals received from the sensor means."

As amended, claim 1 recites that the imaging system includes a plurality of cameras, each of which provide a different view and are controlled by changing the orientation of the

[NL020680]

display means. In contrast, McClure only discloses the use of the servo system in conjunction with a single camera. McClure is specifically directed towards solving problems associated with conventional side-mounted rear-view mirrors, namely blind-spots associated therewith. No other use of McClure's invention is taught or suggested. (See McClure, col. 1, line 10 – col. 2, line 6). Thus, it is respectfully submitted that McClure neither discloses nor suggests the use of multiple cameras.

In addition, it is respectfully submitted that McClure does not teach or suggest using a single display to control multiple cameras, each of which provide different views. As recited in claim 1, each camera is oriented so as to provide a different view. According to McClure, the servo system ensures that the camera tracks the movements of the display. However, McClure provides no indication that this can be extended to include a similar controlling of multiple cameras. Thus, it is respectfully submitted that it would not be obvious to control the cameras using the same device in the manner taught by McClure.

Based on these reasons, it is respectfully submitted that McClure neither discloses nor suggests “the imaging system comprising a plurality of cameras, each of the cameras providing a different view” and “orientation adjusting means arranged to adjust the viewing orientation of the imaging system” and “the orientation adjusting means being arranged to adjust the viewing orientation of the imaging system based on signals received from the sensor means,” as recited in claim 1.

Accordingly, Applicants respectfully request that the Examiner withdraw the 35 U.S.C. § 102(a) and (e) rejection of claim 1. Because claims 2-3, 5 and 7-9 depend from and, therefore, include the limitations of claim 1, it is respectfully submitted that these claims are allowable for at least the reasons stated above with reference to claim 1.

III. THE 35 U.S.C. § 103(a) REJECTIONS SHOULD BE WITHDRAWN

[NL020680]

The Examiner has rejected claims 1, 3, 4 and 6 under 35 U.S.C. § 103(a) as unpatentable over U.S. Pub. No. 2002/0003571 (Schofield) in view of McClure. (See 11/7/06 Office Action, p. 5, ¶ 4).

Schofield describes a vehicular video mirror system including a rear-view mirror assembly and a video display assembly. (See Schofield, abstract). As noted by the Examiner, Schofield does not teach or suggest the ability to sense the adjustment of a display means and adjust the viewing orientation of an imaging system accordingly. (See 11/7/06 Office Action, pp. 5-6, ¶ 4). It is respectfully submitted that Schofield does not cure the deficiencies of McClure. Schofield states that the video display may be used with at least one of a rear back-up camera, a baby-minder camera, and a sidelane-viewing camera. (See Schofield, ¶ [0004]). It is respectfully submitted that it would not be obvious to combine the teachings of Schofield and McClure in the manner suggested by the Examiner. Although Schofield and McClure both describe rear-view systems, McClure is specifically related to controllably viewing a rear-mounted camera. In contrast, Schofield teaches a more passive form of viewing in which a user selects from a plurality of views provided by fix-mounted cameras. (Id. at ¶ [0262]).

In addition, combining the teaching of Schofield with McClure does not produce the teachings of the present invention as recited in claim 1. Even if Schofield and McClure were combined, neither of these two references provides disclosure regarding adjusting a plurality of cameras in response to an adjustment of a display means. McClure only describes how a single rear-mounted camera can be adjusted, while Schofield doesn't teach camera adjustment at all. It is unclear what role the multiple, fix-mounted cameras of Schofield would play in the single-camera system of McClure. At most, the combination of McClure and Schofield would produce a single adjustable camera as taught by McClure in conjunction with a plurality of fixed cameras offering non-adjustable views as taught by Schofield. Thus, it is respectfully submitted that neither Schofield nor McClure, either alone or in combination, disclose nor suggest "the imaging system comprising a plurality of cameras, each of the cameras providing a different view" and "orientation adjusting means arranged to adjust the viewing orientation of the imaging system" and "the orientation adjusting means being arranged to adjust the viewing orientation of the imaging system based on signals received from the sensor means," as recited in claim 1.

[NL020680]

Because claims 3, 4 and 6 depend from and, therefore, include all the limitations of claim 1, it is respectfully submitted that these claims are also allowable.

Claims 10-16 have been added to the present application. It is respectfully submitted that based on at least the arguments stated above, claims 10-16 are allowable as well.

[NL020680]

RECEIVED
CENTRAL FAX CENTER

FEB 07 2007

CONCLUSION

In view of the above remarks, it is respectfully submitted that all the presently pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Please direct all future correspondence to:

Yan Glickberg, Esq.
IP Counsel

Philips Intellectual Property & Standards
P.O. Box 3001
Briarcliff Manor, NY 10510-8001
Phone: (914) 333-9618
Fax: (914) 332-0615

Respectfully submitted,

Dated: February 7, 2007

By: 

Oleg F. Kaplun (Reg. No. 45,559)

Fay Kaplun & Marcin, LLP
150 Broadway, Suite 702
New York, New York 10038
Tel: (212) 619-6000
Fax: (212) 619-0276